



Department of Energy

Washington, DC 20585

QA: L

JUL 01 1997

L. D. Foust, Technical Project Officer  
for Yucca Mountain  
Site Characterization Project  
TRW Environmental Safety Systems, Inc.  
1180 Town Center Drive, M/S 423  
Las Vegas, NV 89134

ISSUANCE OF DEFICIENCY REPORT (DR) YM-97-D-059 RESULTING FROM  
OFFICE OF QUALITY ASSURANCE SURVEILLANCE YM-SR-97-029

Enclosed is DR YM-97-D-059 generated as a result of discussions with the Civilian  
Radioactive Waste Management System Management and Operating Contractor personnel  
performing Global Positioning System/Satellite measurements.

Please identify the corrective action to be taken and implemented to correct the deficiency.  
Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307,  
Mail Stop 455, North Las Vegas, Nevada 89036-0307. Response to the DR is  
due 20 working days from the date of this letter. Any extension to the due date must  
be requested in writing, with appropriate justification, prior to the due date.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or  
Richard L. Weeks at (702) 794-1431.

*R. W. Cel*  
Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-1743

Enclosure:  
DR YM-97-D-059

cc w/encl:  
T. A. Wood, DOE/HQ (RW-55) FORS  
J. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
B. R. Justice, M&O, Las Vegas, NV  
R. A. Morgan, M&O, Las Vegas, NV

cc w/o encl:  
W. L. Belke, NRC, Las Vegas, NV  
R. L. Weeks, OQA/QATSS, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV

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Recip: NMSS/HLR

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PDR WASTE  
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**OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.**

**DEFICIENCY REPORT**  
 Deficiency Report  
 NO. YM-97-D-059  
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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: Quality Assurance Requirements and Description (QARD), Revision 7	2 Related Report No. YMP-SR-97-029
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3 Responsible Organization: Civilian Radioactive Waste Management System Management & Operating Contractor (CRWMS M&O)	4 Discussed With: Claudia Newbury, Steve Bodnar
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5 Requirement/Measurement Criteria:

Section 5.2 states, "Work shall be performed in accordance with controlled implementing documents."

Section 2.2.12 states in part, "Each Affected Organization shall establish a program for the evaluation, selection, indoctrination, training, and qualification of personnel performing work subject to the QARD. The program shall:...

H. Ensure the required indoctrination and training for a specified task is completed prior to performing the task."

Supplement III.2.5.D.2. states, "Qualification shall be planned and documented. The documentation shall include the following:

- a. The factors used in arriving at the choice of qualification methods and also the acceptance criteria used to determine if the data are qualified.
- b. A document review to determine the quality of the data when qualification methods (a), (b), or (c) are used."

6 Description of Condition:

Discussions with CRWMS M&O personnel indicated that Global Positioning System (GPS) methodology is being utilized to obtain data to verify the location of boreholes in an attempt to qualify unqualified survey data. This activity is being performed without the use of a controlled implementing document but rather a DRAFT copy of a Nevada Work Instruction. Additionally, CRWMS M&O personnel stated that confirmatory testing method would be utilized to qualify the unqualified survey data. However, a technical assessment as described in YAP-2.1Q, Revision 1, has not been initiated in order to implement the qualification process and it was indicated by CRWMS M&O staff that there was no intention to initiate a Technical Assessment.

The Yucca Mountain Project currently has one approved method for qualifying unqualified data and that is by implementation of YAP-2.1Q. Contrary to this, the CRWMS M&O is attempting to qualify unqualified survey data in a manner that is not consistent with current program requirements.

7 Initiator Richard L. Weeks Date <u>6/11/97</u>	8 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)

1. Develop, approve and issue an appropriate document to control the collection and processing of data for GPS work activities.
2. Identify all quality affecting coordinate data that has been collected prior to the issuance of an approved procedure and verify that values are correct in accordance with an approved procedure.
3. Describe appropriate indoctrination or training for GPS activities. Provide documentation that indoctrination or training has been completed by personnel performing GPS activities. Complete indoctrination or training prior to completion of recommended actions 1. and 2. above.
4. Initiate a Technical Assessment in accordance with the current revision of YAP-2.1Q in order to document the qualification process.

11 QA Review: QAR Richard L. Weeks Date <u>6/11/97</u>	12 Response Due Date 20 working days from issuance
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13 Affected Organization QA manager issuance Approval: (QAR for PR) Printed Name    Donald G. Horton    Signature <u>R.W. Horton</u> Date <u>7/1/97</u>
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22 Corrective Action Verified QAR    Date	23 Closure Approved by: (N/A for PR) AQAM    Date
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OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

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PR/DR NO. YM-97-D-059

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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required

Yes

No

17 Action to Preclude Recurrence: (Not required for PR)

Required

Yes

No

18 Corrective Action Completion Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date